Ohio EPA
40 years and moving forward
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

November 21, 2012

Mr. Don Hurd
Owens Corning Fiberglass Corporation
2790 Columbus Road
Granville, OH 43023

Re: Owens Corning Science & Technology Center
OHD039992516
Large Quantity Generator
Licking County
Notice of Violation & Return to Compliance

Dear Mr. Hurd:

On November 15, 2012, Ohio EPA conducted a compliance evaluation inspection (CEI) at the Owens Corning Fiberglass Corporation's Science & Technology Center (Owens Corning) located at 2790 Columbus Road, Granville, Ohio in Licking County. The purpose of the CEI was to determine Owens Corning's compliance with the applicable rules and regulations as found in Chapter 3745 of the Ohio Administrative Code (OAC) and Chapter 3734 of the Ohio Revised Code. During the CEI, Owens Corning was represented by you and Roger Ettenhofer, while Ohio EPA was represented by me. The CEI included an inspection of facility operations and a review of associated documentation. We also discussed Owens Corning's pollution prevention and/or waste minimization efforts. In particular detail, we discussed Owens Corning's change-over to non-hazardous fluorescent light bulbs for facility.

As a result of the CEI, it has been determined that Owens Corning was operating in violation of the following OAC rule:

> **OAC rule 3745-66-74, Inspections:** The owner or operator must inspect areas where containers are stored, at least once during the period from Sunday to Saturday, looking for leaks and for deterioration caused by corrosion or other factors. The owner or operator must record inspections in an inspection log or summary.
>
> Reportedly, Owens Corning reviews/inspects the <90 day hazardous waste accumulation area almost daily, but due to recent changes, the inspections were being recorded only monthly.
>
> On the day of the CEI, it was reported that the required inspections would be recorded at least on a weekly basis. Per e-mail received on November 19, 2012, the procedure of recording the weekly inspections of the <90 day hazardous waste accumulation area in a log or summary has been reinstated.

Based on our verbal conversation and written documentation received on November 19, 2012, it has been determined that **Owens Corning has adequately abated the violation referenced above (i.e., OAC rule 3745-66-74) and no further action is necessary at this time**.

Enclosed, please find a copy of the checklists completed as a part of this CEI. Should you have any questions or need additional information, feel free to contact me at 614-728-5037.

Finally, as we discussed, if I am not available you should contact Jeff Mayhugh in our Central Office, telephone number 614-644-2950, should you need any further guidance regarding the management of your spent fluorescent light bulbs.

NOTICE: Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve Owens Corning from having to comply with all applicable rules and regulations.

Respectfully,

Randy Sheldon

Randy Sheldon
Environmental Specialist
Division of Materials and Waste Management
Central District Office

Enclosures

c: DMWM, CDO File

RS/nsm 1-12 NOV

FACILITY/PROCESS DESCRIPTION – WASTE MANAGEMENT

General Facility Information

The Owens Corning Science & Technology Center (OC) is located at 2790 Columbus Road, St. Rt. 16, Granville, Ohio 43023 in Licking County. This facility is owned by the Owens Corning organization which is headquartered in Toledo, OH. The facility is primarily used for research and development of Owens Corning's technologies/products with no actual production/manufacturing activities conducted. Bench scale testing is completed at this facility and many times OC personnel go to the actual production facility to perform production trials. Some of the technologies/products historically invented/reviewed at this facility include: insulation; roofing materials; composite textiles; cultured stone; etc. Besides the process oriented research areas, there are many laboratory areas throughout the facility. This facility was subject to and has completed the RCRA corrective action process, which includes a deed restriction prohibiting shallow drinking water wells (see corrective action file). A temporary <90 day hazardous waste accumulation area was adequately closed (see file).

Hazardous waste management training is provided to all facility personnel during annual training sessions. Persons designated to actually handle/manage the hazardous wastes (2 individuals) receive individual training more often. All training materials are available on OC's automated computer system.

This facility currently has ~460 Owens Corning personnel and ~50 contractors employed. There are several buildings located at the facility. Owens Corning franchise/franchisee training is also conducted at this location. The facility has an on-site wastewater treatment system that is permitted by Ohio EPA's Division of Surface Water.

OC was issued hazardous waste generator identification number OHD039992516. OC operates and is inspected as a large quantity generator of hazardous waste. OC is also a small quantity handler of universal waste and a used oil generator. The Owens Corning organization as a whole promotes pollution prevention in all activities. In particular at this facility, the following has been helpful in accomplishing pollution prevention objectives: specific ordering of chemicals in non-excessive amounts by scientists; reuse of chemicals that would have previously been discarded; specific/constant training on use/disposal of materials; each department is cross-charged for their hazardous waste disposal, so all are aware of the associated costs. Scientists and lab technicians have been instructed to pour no chemicals down their sinks/drains.

Wastes and Management

Hazardous wastes generated at this facility are not from production oriented processes and therefore are not very consistent. The wastes generated are mainly left-over/spent raw materials used in experiments and/or R&D work. The hazardous wastes generated are completely dependent on the current experiments being conducted in conjunction with the results obtained (i.e., early total failures normally lead to increased wastes). Due to the constant variety of hazardous wastes generated at this facility (many lab packs), LDR forms are completed and submitted with each hazardous waste associated manifest/shipment.

There is a waste accumulation complex located near the center of the facility property. This complex consists of several small buildings/structures, all within a locking gate and fenced area. The specified <90 day hazardous waste accumulation building is also locked. It is also bermed and vented. Non-hazardous wastes, used oil, e-wastes, etc. are managed within a three-sided shelter located within the complex. The floors of the structures are concrete and all areas drain to in-ground concrete sumps/vaults for capture of any releases.

There are four (4) hazardous waste satellite accumulation areas at the facility. Located at the east end of Building 22 is peroxide storage shed #1. This shed has two (2) individual units that are cooled and kept locked. One side is used for waste peroxide and the other side is used for product. No waste peroxide was in accumulation at the time of the inspection. It was reported that use of peroxides at the facility has been declining. Located in Building 22 is a 55-gallon satellite container in the laboratory area for management of waste acetone. A 30-gallon heavy metals/mineral acid solution satellite area container is located in Building 21. An aerosol can filtered/puncture device on a 55-gallon container is located at the waste accumulation complex. When a satellite container is filled/limit is reached, the hazardous materials technician is immediately called and the waste container is dated and moved to the <90 day accumulation area.

All hazardous wastes sent off-site for management/disposal are sent to American Environmental Services in Calvert City, KY (KYD985073196).

Normally, one of the only consistent hazardous waste streams is the waste corrosive liquid containing heavy metals (D002, D007, D008) generated in the Building 21 laboratory satellite accumulation area. This waste stream is from laboratory operations. In calendar year 2011, approximately 1,300 pounds of this waste was generated.

Other hazardous waste streams reported year to year include the following: hazardous waste liquid containing lead (D008), in 2011 1,000 pounds; waste mercury (D009), in 2011 95 pounds; hazardous waste solid refractory brick with chrome (D007), in 2011 50 pounds; flammable waste aerosols (D001), in 2011 800 pounds; and, waste compressed gases (D001), in 2011 7 pounds.

Various lab packs and other single year generated hazardous wastes include, but may not be limited to, the following: waste monoaluminum phosphate solution (D002), in 2011 400 pounds; toxic waste flammable liquid (D001), in 2011 500 pounds; waste propane cylinders (D001), in 2011 20 pounds; and, waste resin solution (D001), in 2011 450 pounds. Other various hazardous waste codes associated with lab packs and/or generated in the past were: D003, D018, D022, D038, F003, F005, U002, U080, U123, U134, U147, U201, and U213.

There are two (2) Safety-Kleen managed parts cleaners used at the facility. The solvent used in these parts cleaners are part of the Safety-Kleen solvent reuse program.

Used oils are generated from the facility equipment maintenance (i.e., mowing equipment, process equipment, etc.). The used oil is managed in 55-gallon containers. A used oil container is kept at the Building 61 maintenance area until filled. Upon filling, the container is moved to the waste accumulation complex.

The facility has switched to reportedly non-hazardous fluorescent light bulbs. These non-hazardous bulbs are managed by the supplier McNaughten and McCoy and are taken back

to their facility. This management procedure was discussed in detail with Owens Corning staff during the CEI and afterwards. Owens Corning is discussing the ultimate management of the bulbs with their supplier and OC was told if they needed additional information/guidance, to discuss all with Central Office staff (J. Mayhugh) for the division's position on the matter.

Paper only wastes are burned in an on-site incinerator unit which is permitted by Ohio EPA's Division of Air Pollution Control.

Waste Management handles all of the solid waste/trash generated at the facility (i.e., roofing shingles, solid asphalt, calcium carbonate, etc.).

LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

CESQG: ≤100 Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.
NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]		Yes ☒ No ☐ N/A ☐
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]		Yes ☒ No ☐ N/A ☐
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]		Yes ☒ No ☐ N/A ☐
4.	Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)]		Yes ☒ No ☐ N/A ☐
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)]		Yes ☒ No ☐ N/A ☐
6.	Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]		Yes ☐ No ☒ N/A ☐
7.	Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)]		Yes ☐ No ☒ N/A ☐
8.	Does the generator accumulate hazardous waste?		Yes ☒ No ☐ N/A ☐
NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.			
9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)?		Yes ☐ No ☒ N/A ☐
NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G)&(H).			
10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]		
	a.	Container that meets 3745-66-70 to 3745-66-77?	Yes ☐ No ☐ N/A ☒
	b.	Tank that meets 3745-66-90 to 3745-66-100 except 3745-66-97(C)?	Yes ☐ No ☐ N/A ☒
	c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes ☐ No ☐ N/A ☒
	d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes ☐ No ☐ N/A ☒
NOTE: Complete appropriate checklist for each unit.			
NOTE: If waste is treated to meet LDRs, use LDR checklist.			
11.	Does the generator export hazardous waste? If so:		Yes ☐ No ☒ N/A ☐
	a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes ☐ No ☐ N/A ☒
	b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes ☐ No ☐ N/A ☒
	c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes ☐ No ☐ N/A ☒
	d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes ☐ No ☐ N/A ☒

	e.	Are export related documents being maintained on-site? [3745-52-57(A)]	Yes ☐ No ☐ N/A ☒
MANIFEST REQUIREMENTS			
12.		Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]	Yes ☒ No ☐ N/A ☐
13.		Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)]	Yes ☒ No ☐ N/A ☐
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)(1)]			
14.		Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes ☒ No ☐ N/A ☐
NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]			
15.		If the transporter was unable to deliver a shipment of hazardous waste to the designated facility, did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes ☐ No ☐ N/A ☒
16.		Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]	Yes ☒ No ☐ N/A ☐
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.			
17.		If the generator received a rejected load or residue, did the generator:	
	a.	Sign item 20 of the new manifest or item 18c of the original manifest? [3745-52-23(F)(1)	Yes ☐ No ☐ N/A ☒
	b.	Provide the transporter a copy of the manifest? [3745-52-23(F)(2)]	Yes ☐ No ☐ N/A ☒
	c.	Send a copy of the manifest to the designated facility that returned the shipment with 30 days after delivery of the rejected shipment? [3745-52-23(F)(3)]	Yes ☐ No ☐ N/A ☒
18.		If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	Yes ☐ No ☐ N/A ☒
19.		If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	Yes ☐ No ☐ N/A ☒
20.		Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes ☒ No ☐ N/A ☐
NOTE: A generator who sends a shipment of hazardous waste to a TSD facility with the understanding that the TSD facility can accept and manage the waste and later receives that shipment back as a rejected load or residue may accumulate the waste on-site for <90 days or <180 days depending on the amount of hazardous waste on-site in that calendar month. [3745-52-34(M)]			
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.			
PERSONNEL TRAINING			
21.		Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)]	Yes ☒ No ☐ N/A ☐
22.		Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)]	Yes ☒ No ☐ N/A ☐

NOTE: For facility employees that receive emergency response training pursuant to OSHA regulations, the facility is not required to provide separate emergency response training, provided that the overall facility training meets all the requirements of OAC 3745-65-16(A). [3745-65-16(A)(4)]

23.		Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes ☒ No ☐ N/A ☐
24.		Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes ☒ No ☐ N/A ☐
25.		Does the generator provide refresher training to employees during each period from January 1st to December 31st and does each training occur within 15 months after the previous training? [3745-65-16(C)]	Yes ☒ No ☐ N/A ☐
26.		Does the generator keep records and documentation of:	
	a.	Job titles? [3745-65-16(D)(1)]	Yes ☒ No ☐ N/A ☐
	b.	Job descriptions? [3745-65-16(D)(2)]	Yes ☒ No ☐ N/A ☐
	c.	Type and amount of training given to each person? [3745-65-16(D)(3)]	Yes ☒ No ☐ N/A ☐
	d.	Completed training or job experience required? [3745-65-16(D)(4)]	Yes ☒ No ☐ N/A ☐
27.		Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)].	Yes ☒ No ☐ N/A ☐

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the -job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

Job Performed	Name of Employee	Date Trained

CONTINGENCY PLAN

28.		Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)]	Yes ☒ No ☐ N/A ☐
29.		Does the plan describe the following:	
	a.	Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)]	Yes ☒ No ☐ N/A ☐
	b.	Arrangements with emergency authorities? [3745-65-52(C)]	Yes ☒ No ☐ N/A ☐
	c.	A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)]	Yes ☒ No ☐ N/A ☐
	d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes ☒ No ☐ N/A ☐
	e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes ☒ No ☐ N/A ☐

NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. The facility may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-65-52(B)]

30.		Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)]	Yes ☒ No ☐ N/A ☐

31.	Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54]		Yes ☒ No ☐ N/A ☐
32.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]		Yes ☒ No ☐ N/A ☐

NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.

EMERGENCY PROCEDURES

33.	Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:		Yes ☐ No ☒ N/A ☐
	a.	Was the contingency plan implemented? [3745-65-51(B)]	Yes ☐ No ☐ N/A ☒
	b.	Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes ☐ No ☐ N/A ☒
	c.	Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(I)?	Yes ☐ No ☐ N/A ☒

NOTE: OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.

PREPAREDNESS AND PREVENTION

34.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]		Yes ☒ No ☐ N/A ☐
35.	Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:		
	a.	Internal communications or alarm system? [3745-65-32(A)]	Yes ☒ No ☐ N/A ☐
	b.	Emergency communication device? [3745-65-32(B)]	Yes ☒ No ☐ N/A ☐
	c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes ☒ No ☐ N/A ☐
	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes ☒ No ☐ N/A ☐

NOTE: Verify that the equipment is listed in the contingency plan.

36.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes ☒ No ☐ N/A ☐
37.	Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]	Yes ☒ No ☐ N/A ☐
38.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]	Yes ☒ No ☐ N/A ☐
39.	If there is only one employee on the premises, is there immediate access to a device (eg. phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]	Yes ☒ No ☐ N/A ☐
40.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes ☒ No ☐ N/A ☐
41.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]	Yes ☒ No ☐ N/A ☐
42.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes ☐ No ☐ N/A ☒

SATELLITE ACCUMULATION AREA REQUIREMENTS			
43.	Does the generator ensure that satellite accumulation area(s):		
	a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes ☒ No ☐ N/A ☐
	b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes ☒ No ☐ N/A ☐
	c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes ☒ No ☐ N/A ☐
	d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes ☒ No ☐ N/A ☐
	e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes ☒ No ☐ N/A ☐
	f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes ☒ No ☐ N/A ☐
44.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:		Yes ☒ No ☐ N/A ☐
	a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes ☒ No ☐ N/A ☒
	b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes ☒ No ☐ N/A ☐
NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less then 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.			
USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS			
45.	Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]		Yes ☒ No ☐ N/A ☐
46.	Is the accumulation date on each container? [3745-52-34(A)(2)]		Yes ☒ No ☐ N/A ☐
47.	Are hazardous wastes stored in containers which are:		
	a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes ☒ No ☐ N/A ☐
	b.	In good condition? [3745-66-71]	Yes ☒ No ☐ N/A ☐
	c.	Compatible with wastes stored in them? [3745-66-72]	Yes ☒ No ☐ N/A ☐
	d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes ☒ No ☐ N/A ☐
NOTE: Record location on process summary sheets, photograph the area, and record on facility map.			
48.	Is the container accumulation areas(s) inspected at least once during the period from Sunday to Saturday? [3745-66-74] ***Area is reportedly inspected/viewed almost daily.**		Yes ☒* No ☐ N/A ☐
	a.	Are inspections recorded in a log or summary? [3745-66-74] ***Inspection log indicates inspections were completed on a monthly basis (recent change).**	Yes ☐ No ☒ N/A ☐
49.	Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]		Yes ☒ No ☐ N/A ☐
50.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]		Yes ☒ No ☐ N/A ☐
51.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)?		Yes ☒ No ☐ N/A ☐

	[3745-66-77(A)]	
52.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]	Yes ☐ No ☐ N/A ☒
NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.		
53.	If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] ***Temporary <90 day area adequately closed, see corrective action file.**	Yes ☒* No ☐ N/A ☐
NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]		
PRE-TRANSPORT REQUIREMENTS		
54.	Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes ☒ No ☐ N/A ☐
55.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes ☒ No ☐ N/A ☐
56.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes ☒ No ☐ N/A ☐
NOTE: Continue with the generator LDR requirements on the next page.		

GENERATOR LDR REQUIREMENTS				
NOTE: This LDR checklist does not include the requirements for generators that treat to meet LDR standards. If the generator treats, the inspector should use the stand-alone Generator LDR checklist instead of this checklist.				
GENERAL REQUIREMENTS				
1.	If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07(A)(7)]			Yes ☐ No ☐ N/A ☒
2.	Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] If not,			Yes ☒ No ☐ N/A ☐
	a.	Did the generator send the waste to a permitted HW TREATMENT facility? [3745-270-07(A)(1)]		Yes ☒ No ☐ N/A ☐
NOTE: This is done by determining if the HW/soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07(A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).				
3.	Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)]			Yes ☒ No ☐ N/A ☐
4.	Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)]			Yes ☒ No ☐ N/A ☐
5.	Does the generator generate a listed HW that exhibits a characteristic? If yes,			Yes ☒ No ☐ N/A ☐
	a.	Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)]		Yes ☒ No ☐ N/A ☐
FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.				
6.	Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)]			Yes ☒ No ☐ N/A ☐
NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.				
NOTE: Written documentation of this determination is not required.				
7.	Did the generator treat his HW /soil on-site <u>to meet</u> the LDR treatment standard?			Yes ☐ No ☒ N/A ☐
NOTE: If "Yes" see question #16.				
8.	Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility? [3745-270-07(A)(2)]			Yes ☐ No ☒ N/A ☐
	a.	If the generator chose not to make the determination of whether his waste must be treated, did he send a notice to the TSD facility with each shipment? [3745-270-07(A)(2)] If so, did the notice include:		Yes ☐ No ☐ N/A ☒
		i	Applicable HW codes?	Yes ☐ No ☐ N/A ☒
		ii	Manifest number of the first shipment to the TSD?	Yes ☐ No ☐ N/A ☒
		iii	A statement that conveys that the HW may or may not be subject to the LDR treatment standards and the TSD must make that determination."?	Yes ☐ No ☐ N/A ☒
9.	Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)]			Yes ☐ No ☐ N/A ☒
10.	Does the generator have a copy of the LDR notification form/notice on file?			Yes ☒* No ☐ N/A ☐

	[3745-270-07(A)(2)] ***A new LDR form is completed for each manifest.**		
	a.	Is the form/notice kept on file for three years after last HW shipped? [3745-270-07(A)(8)]	Yes ☒ No ☐ N/A ☐
NOTIFICATION FORM			
11.	Does the LDR Notification form contain the following information:		
	a.	Manifest number of the first waste shipment to the TSD? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
	b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
	c.	A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
	d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
NOTE: A wastewater contains <1% by wt. total suspended solids (TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.			
	e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories			
	f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.			
	g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for? [3745-270-07(A)(2)]	Yes ☐ No ☐ N/A ☒
NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.			
PROHIBITED DILUTION			
12.	Is the HW treated by burning? If "No" go to #15.		Yes ☒ No ☐ N/A ☐
13.	Is the HW a metal-bearing HW?		Yes ☐ No ☒ N/A ☐
NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs is given in the Appendix to 3745-270-03.			
14.	a.	Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless **one** of the following conditions apply. [3745-270-03(c)]	
		i. Contains > 1% TOC?	Yes ☐ No ☐ N/A ☒
		ii. Contains organic constituents or cyanide at levels greater than the UTS levels?	Yes ☐ No ☐ N/A ☒
		iii. Is made up of combustible material e.g., paper, wood, plastic?	Yes ☐ No ☐ N/A ☒
		iv. Has a reasonable heating value (e.g., > 5000 Btu)?	Yes ☐ No ☐ N/A ☒
		v. Co-generated with a HW that must be combusted?	Yes ☐ No ☐ N/A ☒
	b.	If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?	Yes ☐ No ☐ N/A ☒

15.	Was the HW treated by wastewater treatment?		Yes ☐ No ☒ N/A ☐
	a.	Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]	Yes ☐ No ☐ N/A ☒
NOTE: If "Yes", HW is improperly being treated by dilution.			
	b.	Does the waste carry the D001 code <u>and</u> contain ≥10% TOC?	Yes ☐ No ☐ N/A ☒
	c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes ☐ No ☐ N/A ☒
NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B)] and 3745-270-40(A)(3)].			
NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.			

USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS

NOTE: 1. A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

2. Inspectors can check BUSTR's web-site at https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/PublicInquiry.asp to determine if a UST containing used oil is registered with BUSTR. Inspectors may call BUSTR at 614-752-7938 or a BUSTR site coordinator to report an unregistered UST or a UST that appears to not be in compliance with BUSTR regulations. A list of BUSTR coordinators by county are at: https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/SearchByCounty.asp.

PROHIBITIONS

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:		Yes ☐ No ☒ N/A ☐
	a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes ☐ No ☐ N/A ☒
NOTE: For example, used oil contaminated scrap metal stored in a pile.			
2.	Is used oil used as a dust suppressant? [3745-279-12(B)]		Yes ☐ No ☒ N/A ☐
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?		Yes ☐ No ☐ N/A ☒
NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., If generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).			

GENERATOR STANDARDS

4.	Does the generator mix hazardous waste with used oil? If so,		Yes ☐ No ☒ N/A ☐
	a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes ☐ No ☐ N/A ☒
NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.			
5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]		Yes ☐ No ☐ N/A ☒
NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.			
6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]		Yes ☒ No ☐ N/A ☐
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]		Yes ☒ No ☐ N/A ☐
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]		Yes ☒ No ☐ N/A ☐
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]		Yes ☒ No ☐ N/A ☐
	a.	Stopped the release?	Yes ☒ No ☐ N/A ☐
	b.	Contained the release?	Yes ☒ No ☐ N/A ☐
	c.	Cleaned up and properly managed the used oil and other materials?	Yes ☒ No ☐ N/A ☐
	d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes ☒ No ☐ N/A ☐

ON-SITE BURNING IN SPACE HEATER			
10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:		
	a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes ☐ No ☐ N/A ☒
	b.	Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour?	Yes ☐ No ☐ N/A ☒
	c.	Are the combustion gases from heater vented to the ambient air?	Yes ☐ No ☐ N/A ☒
NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).			
GENERATOR TRANSPORTATION			
11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]		Yes ☒ No ☐ N/A ☐
12.	If the generator self-transports used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]		
	a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes ☐ No ☐ N/A ☒
	b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes ☐ No ☐ N/A ☒
NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).			
COLLECTION CENTERS AND AGGREGATION POINTS			
13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]		Yes ☐ No ☐ N/A ☒
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]		Yes ☐ No ☐ N/A ☒
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]		Yes ☐ No ☐ N/A ☒
NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.			

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS			
Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more			
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less			
PROHIBITIONS			
1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]		Yes ☐ No ☒ N/A ☐
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]		Yes ☐ No ☒ N/A ☐
WASTE MANAGEMENT AND LABELING/MARKING			
UNIVERSAL WASTE BATTERIES			
3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]		Yes ☒ No ☐ N/A ☐
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]		Yes ☒ No ☐ N/A ☐
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]		Yes ☐ No ☒ N/A ☐
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]		Yes ☐ No ☐ N/A ☒
	a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes ☐ No ☐ N/A ☒
	b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]	Yes ☐ No ☐ N/A ☒
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste-Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)?" [3745-273-14(A)]		Yes ☒ No ☐ N/A ☐
UNIVERSAL WASTE PESTICIDES			
8.	Does the SQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-13(B)(1)]		Yes ☐ No ☐ N/A ☒
9.	If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-13(B)(2)]		Yes ☐ No ☐ N/A ☒
10.	If the pesticide is stored in a tank, are the requirements of rules 3745-66-90 through 3745-66-101, except for paragraph (C) of 3745-66-97, of the OAC met? (Use tank checklist) [3745-273-13(B)(3)]		Yes ☐ No ☐ N/A ☒
11.	If pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-13(B)(4)]		Yes ☐ No ☐ N/A ☒
12.	Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-14(B)(1)&(2)]		Yes ☐ No ☐ N/A ☒
13.	Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste-Pesticides" or "Waste Pesticides?" [3745-273-14(C)(1)&(2)]		Yes ☐ No ☐ N/A ☒
UNIVERSAL WASTE MERCURY-CONTAINING EQUIPMENT			
14.	Has mercury-containing equipment with non-contained elemental mercury		Yes ☐ No ☐ N/A ☒

		or that shows evidence of leakage, spillage or damage that could cause leaks been placed in a container that is closed, structurally sound, compatible with contents of the device and lacks evidence of leakage, spillage or damage that could cause leakage and is designed to prevent escape of mercury into the environment by volatilization or any other means? [3745-273-13(C)(1)]	
15.		If the mercury-containing ampules are removed, does the SQUWH: [3745-273-13(C)(2)]	
	a.	Remove and manage the ampules in a manner to prevent breakage and is the removal done over or in a containment device? [3745-273-13(C)(2)(a)&(b)]	Yes ☐ No ☐ N/A ☒
	b.	Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC rule 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-13(C)(2)(c)&(d)]	Yes ☐ No ☐ N/A ☒
	c.	Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-13(C)(2)(e)]	Yes ☐ No ☐ N/A ☒
	d.	Ensure that employees are thoroughly familiar with the proper waste handling and emergency procedures? [3745-273-13(C)(2)(f)]	Yes ☐ No ☐ N/A ☒
	e.	Ensure that removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-13(C)(2)(g)]	Yes ☐ No ☐ N/A ☒
	f.	Pack removed ampules in containers with packing material to prevent breakage during storage, handling and transportation? [3745-273-13(C)(2)(h)]	Yes ☐ No ☐ N/A ☒
16.		If the open original housing holding mercury is removed from a mercury-containing equipment that does not contain an ampule, does the SQUWH: [3745-273-13(C)(3)]	Yes ☐ No ☐ N/A ☒
	a.	Immediately seal the original housing holding the mercury with an air-tight seal to prevent the release of any mercury to the environment? [3745-273-13(C)(3)(a)]	Yes ☐ No ☐ N/A ☒
	b.	Follow all requirements for removing ampules and managing removed ampules in accordance with 3745-273-13(C)(2)? [3745-273-13(C)(3)(b)]	Yes ☐ No ☐ N/A ☒
17.		When removing mercury containing ampules from mercury-containing equipment or sealing mercury from its original housing if there are mercury or clean-up residues resulting from spills or leaks, and/or other waste generated (e.g., remaining mercury-containing device), has it been determined whether those exhibit a characteristic of hazardous waste identified in OAC rules 3745-51-20 to 3745-51-24? [3745-273-13(C)(4)(a)]	Yes ☐ No ☐ N/A ☒
	a.	If the residues, and/or wastes are characteristic, are they managed in compliance with Chapters 3745-50 through 3745-69, 3745-205, 3745-256, 3745-266, and 3745-270 of the Administrative Code? (The handler is considered the generator of the mercury, residues, and/or other waste and is subject to OAC Chapter 3745-52) [3745-273-13(C)(4)(b)]	Yes ☐ No ☐ N/A ☒
18.		Is mercury-containing equipment or containers of mercury-containing equipment labelled either "Universal Waste-Mercury-Containing Equipment" or "Waste Mercury-Containing Equipment" or "Used Mercury-Containing Equipment"? [3745-237-14(D)(1)]	Yes ☐ No ☐ N/A ☒
19.		Are mercury-containing thermostats or containers containing ONLY thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)?" [3745-273-14(D)(2)]	Yes ☐ No ☐ N/A ☒
UNIVERSAL WASTE LAMPS			
20.		Does the SQUWH contain lamps in containers or packages that are	Yes ☐ No ☐ N/A ☒*

	structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)] ***OC has replaced all fluorescent lamps with reportedly non-hazardous fluorescent lamps that are managed by their supplier McNaughten & McCoy.**	
21.	Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]	Yes ☐ No ☐ N/A ☒
NOTE: ***Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)].*** *A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC ruie 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.*		
22.	Are the lamps or containers or packages of lamps labeled with the words "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)?" [3745-273-14(E)]	Yes ☐ No ☐ N/A ☒
ACCUMULATION TIME		
23.	Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes ☒ No ☐ N/A ☐
a.	If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)]	Yes ☐ No ☐ N/A ☒
NOTE: Accumulation is defined as date generated or date received from another handler.		
24.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)] If yes, describe below: Universal waste batteries are shipped more than one time per year. This can be reviewed via the associated manifests.	Yes ☒ No ☐ N/A ☐
EMPLOYEE TRAINING		
25.	Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]	Yes ☒ No ☐ N/A ☐
RESPONSE TO RELEASES		
26.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes ☒ No ☐ N/A ☐
27.	Is the material released characterized? [3745-273-17(B)]	Yes ☒ No ☐ N/A ☐
28.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-17(B)]	Yes ☒ No ☐ N/A ☐
OFF-SITE SHIPMENTS		
NOTE: If a SQUWH self-transports waste, then the handler must comply with the Universal Waste transporter		

requirements.			
29.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]		Yes ☒ No ☐ N/A ☐
30.	Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.		Yes ☒ No ☐ N/A ☐
31.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]		Yes ☒ No ☐ N/A ☐
32.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?		Yes ☐ No ☒ N/A ☐
	a.	If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)]	Yes ☐ No ☐ N/A ☒
33.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one of the following</u>:		Yes ☐ No ☐ N/A ☒
	a.	Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)]	Yes ☐ No ☐ N/A ☒
34.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]		Yes ☐ No ☐ N/A ☒

EXPORTS

NOTE: Small quantity handlers that export waste to the countries listed in 40 CFR 262.58(a)(1) are subject to 40 CFR 262 subpart H. Small quantity handlers that export waste to a foreign destination other than the countries listed in 40 CFR 262.58(a)(1) are subject to 40 CFR 262.53, 40 CFR 262.56(a)(1) to (a)(4), (a)(6), and (b), 40 CFR 262.57, and 40 CFR 262 subpart E. [3745-273-20]

NOTE: Violations regarding exporting universal waste to foreign destinations should be referred to U.S. EPA Region 5 because the federal counterpart provisions are not delegable to states.